# PSJ3 Exhibit 592



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# **Memorandum**

**TO:** Chris Zimmerman

FROM: Steve Mays

**DATE:** March 26, 2013

SUBJECT: Staffing and Resource Requirements to Ensure CSRA Mission Success

### **Assumptions:**

- 1. Anderson/Brecon will be divested
- 2. ABC Canada will be divested
- 3. Walgreens (WAG) will not monitor or manage store controlled substance ordering
- 4. Walgreens will fully onboard as scheduled in September 2013
- 5. CSRA will contract with 3<sup>rd</sup> party for X number of pharmacy inspections
- 6. ABC Corporate/ABDC Corporate will acquire additional office space
- 7. Network/Compliance Complaint tracking moves to Office of Compliance and can managed by Patty Archer
- 8. James McWilliams will provide Security and Regulatory oversight at Frisco corporate offices for ABSG.

## **CSRA Staffing and Resource Requirements by Functional Group:**

### **Regulatory Affairs (Distribution):**

No immediate needs for the CSRA corporate regulatory group. CSRA is working with the ABDC WAG integration team to ensure adequate regulatory compliance resources are in place at the operating DCs. **Additional FTEs = 0** 

# **Diversion Control Program (DCP):**

With the on boarding of WG it will be necessary to restructure the DCP in order to maintain the highest levels of due diligence and customer monitoring. CSRA would need to add one (1) additional Investigator (open or in South) and two (2) DCP Specialists (one in orange and one in VF) to form a structure that would provide for an investigator in each of the three ABDC Regions to enable more familiarization with customers, sales team, and DC contacts. The three (3) investigators reporting directly

to the Director, DCP would conduct all New Customer Due Diligence as well as ongoing due diligence investigations of existing customers on a regional basis, as well as conducting selected site visits.

The three DCP Specialists reporting directly to the DCP Manager would be responsible for monitoring OMP, suspicious order reporting and evaluating data provided by the CSRA DCP Manager. **Additional FTEs = 3, Timeframe = Immediately** 

### **Corporate Security – Investigations:**

With the on boarding of WAG there is a high probability of increased losses in-transit inbound and outbound at a rate that could double the current volume. There will also be significantly more inventory and over 1,000 additional Associates. Corporate Security – Investigations needs two (2) Investigators Preferably one (1) based in the Southern US or West Coast and one (1) in Valley Forge. Additional FTE's = 2, Timeframe = 1 in May and 1 in August

### Corporate Security – Systems & Programs (BCP):

With the additional workload and customer requirements for operational BCP plans, one additional Manager Level associate devoted entirely to BCP would be needed.

Additional FTEs = 1, Timeframe = August/September

### Facilities:

If ABC corporate expands beyond the existing two buildings, Facilities will need to add one Coordinator Level Associate. **Additional FTEs = 1, Timeframe = TBD**